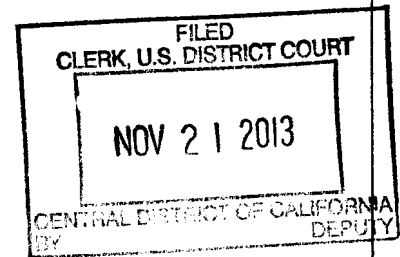


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9 Attorneys for Plaintiff

10 AMAH ESSIET

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13
14 AMAH ESSIET,

15 Plaintiff,

16 v.

17
18 CROWLEY LINER SERVICES INC.;
19 CROWLEY MARITIME
20 CORPORATION; CROWLEY
21 TECHNICAL MANAGEMENT; and
22 AMERICAN ROLL-ON ROLL-OFF
23 CARRIER, LLC,

24 Defendants.

CV13-08623

Case No.

- ABC (MRW)

COMPLAINT FOR DAMAGES AND
DEMAND FOR JURY TRIAL

25 COMES NOW PLAINTIFF AMAH ESSIET and complains of defendants,
26 and each of them, and alleges:
27

28 //

1 FIRST CAUSE OF ACTION FOR NEGLIGENCE

2 1. Plaintiff AMAH ESSIET resides in Long Beach, California and is a
3 citizen of the State of California.
4

5 2. Defendant CROWLEY LINER SERVICES INC. is located Jacksonville,
6 Florida. It is a citizen of the State of Florida.
7

8 3. Defendant CROWLEY MARITIME CORPORATION is located in
9 Jacksonville, Florida and is a citizen of the State of Florida.
10

11 4. Defendant CROWLEY TECHNICAL MANAGEMENT is located in
12 Jacksonville, Florida and is a citizen of the State of Florida.
13

14 5. Defendant AMERICAN ROLL-ON ROLL-OFF CARRIER, LLC is
15 located in Park Ridge, New Jersey. It is a citizen of the State of New Jersey.
16

17 6. The bases of federal jurisdiction are the Jones Act, 46 U.S.C. Sec. 30104,
18 and admiralty.

19 7. Each defendant was at all times mentioned herein the agent, employer
20 and joint venturer of and with each and every other defendant.
21

22 8. From September 25, 2010, through December 26, 2010, plaintiff was
23 employed by defendants as an unlicensed apprentice seaman aboard the vessel
24 M/V INDEPENDENCE II. At all times mentioned herein plaintiff was a Jones
25 Act seaman.
26
27
28

1 9. At all times mentioned herein defendants employed the crew of the vessel
2 M/V INDEPENDENCE II.

3 10. At all times material hereto defendants were the owners, operators,
4 charterers, possessors, operators, safety inspectors, modifiers, outfitters, managers,
5 controllers and crew employers of the vessel M/V INDEPENDENCE II which they
6 owned, managed, operated, and controlled in coastwise, intercoastal and foreign
7 navigation in navigable waters.
8

9 11. At all times mentioned herein defendants conducted business in the
10 State of California and maintained business facilities in the State of California.
11

12 12. While plaintiff AMAH ESSIET was employed by defendants from
13 September 26, 2010, through December 26, 2010, aboard the vessel M/V
14 INDEPENDENCE II in navigable waters in the Atlantic Ocean between the United
15 States and Europe he suffered severe and disabling injuries to his right hand, right
16 wrist, right elbow, right arm, right shoulder and neck as a result of the repetitive
17 use of vibrating needle guns. Plaintiff's injuries were caused by the negligent
18 failure of the defendants to provide plaintiff with a safe place to work and safe
19 work procedures. Defendants negligently provided plaintiff with needle guns
20 which lacked vibration isolation safety features. Defendants negligently failed to
21 provide plaintiff with anti-vibration gloves.
22
23
24
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1 13. After plaintiff advised defendants that operating needle guns was
2 causing him pain defendants negligently required plaintiff to continue operating
3 needle guns without vibration isolation safety features and without anti-vibration
4 gloves.
5

6 14. Defendants negligently failed to conduct a job hazard analysis
7 concerning the use of needle guns aboard the M/V INDEPENDENCE II in
8 violation of the International Safety Management (ISM) Code therefore they are
9 negligent per se.
10
11

12 15. As a result of defendant's negligence plaintiff was hurt and injured in
13 his health, strength and activity, sustaining serious injures, all of which injuries
14 have caused and continue to cause plaintiff great mental, physical and nervous pain
15 and suffering and loss of enjoyment of life in an amount to be proven at trial.
16 Plaintiff is informed and believes and thereon alleges that such injuries will result
17 in permanent disability to him.
18
19

20 16. As a further result of defendant's negligence plaintiff has incurred and
21 will continue to incur medical and related expenses, the full amount of which is not
22 known to plaintiff at this time, and plaintiff will move to amend this complaint to
23 state such amount when the same becomes known to him, on proof thereof. The
24 amount of plaintiff's medical expenses will be proven at trial.
25
26
27
28

1 17. As a further result of defendant's negligence plaintiff's earning capacity
2 has been greatly impaired, both past and future, and plaintiff has suffered and will
3 continue to suffer a loss of wages, fringe benefits and wage earning capacity and
4 the ability to perform household services in an amount which will be proven at
5 trial.
6

7
8 SECOND CAUSE OF ACTION FOR UNSEAWORTHINESS

9 18. Plaintiff incorporates by reference, as though fully set forth below, each
10 and every allegation of paragraphs 1 through 17 of the First Cause of Action
11 herein.
12

13 19. While plaintiff was assigned to the M/V INDEPENDENCE II
14 defendants failed to provide plaintiff with a seaworthy vessel in that the needle
15 guns he was required to use did not have vibration isolation features and he was
16 not provided with anti-vibration gloves. As a result of the unseaworthiness of
17 defendants' vessel plaintiff suffered severe disabling injuries to his right hand,
18 right wrist, right elbow, right arm, right shoulder and neck.
19
20
21

22 THIRD CAUSE OF ACTION FOR MAINTENANCE AND CURE AND
23 UNEARNED WAGES

24 20. Plaintiff incorporates by reference, as though fully set forth below, each
25 and every allegation of paragraphs 1 through 19 of the First and Second Causes of
26 Action herein.
27
28

1 21. While working aboard the vessel M/V INDEPENDENCE II from
2 September 26, 2010, through December 26, 2010, in navigable waters in the
3 Atlantic Ocean between the United States and Europe plaintiff suffered severe and
4 disabling injuries.
5

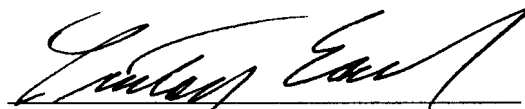
6 22. Immediately prior to suffering these injuries, plaintiff was a strong, able
7 bodied person, capable of continuous gainful employment in the occupation of
8 unlicensed apprentice seaman. By reason of these disabling injuries, plaintiff has
9 been caused to suffer great physical and mental pain and suffering, and has
10 incurred and will continue to incur medical and related expenses, and for a period
11 of time was and will be unable to attend to his usual occupation as an unlicensed
12 apprentice seaman. He is therefore entitled to maintenance and cure and unearned
13 wages.
14
15
16

17 WHEREFORE, plaintiff prays judgment against defendants, and each of
18 them, as follows:
19

- 20 1. For general damages, according to proof;
- 21 2. For damages for medical and related expenses, according to proof;
- 22 3. For damages for lost earnings, both past and future, and loss of earning
23 capacity and fringe benefits, and loss of ability to perform household
24 services, according to proof;
25
26
27
28

- 1 4. For an amount representing plaintiff's maintenance and cure and
- 2 unearned wages, according to proof;
- 3
- 4 5. For attorney fees, according to proof;
- 5
- 6 6. For costs of suit herein incurred;
- 7
- 8 7. For such other and further relief as the Court may deem proper.

9 Date: November 19, 2013

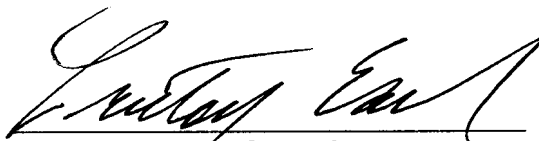


PRESTON EASLEY
CHRISTOPHER BULONE
KEVIN CONLOGUE
Attorneys for Plaintiff
AMAH ESSIET

1
2
3 DEMAND FOR JURY TRIAL
4

5 Plaintiff AMAH ESSIET hereby demands a trial by jury in this action.
6

7
8 Date: November 19, 2013



9 PRESTON EASLEY
10 CHRISTOPHER BULONE
11 KEVIN CONLOGUE
12 Attorneys for Plaintiff
13 AMAH ESSIET
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge Audrey B. Collins and the assigned
Magistrate Judge is Michael R. Wilner.

The case number on all documents filed with the Court should read as follows:

2:13-cv-08623-ABC(MRWx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

November 21, 2013

Date

By APEDRO
Deputy Clerk

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ Western Division
312 N. Spring Street, G-8
Los Angeles, CA 90012

☐ Southern Division
411 West Fourth St., Ste 1053
Santa Ana, CA 92701

☐ Eastern Division
3470 Twelfth Street, Room 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California ☒

AMAH ESSIET,

Plaintiff(s)

v.

CROWLEY LINER SERVICES, INC.; CROWLEY
MARITIME CORPORATION; CROWLEY
TECHNICAL MANAGEMENT; and AMERICAN
ROLL-ON ROLL-OFF CARRIER, LLC,

Defendant(s)

Civil Action No.

CV13-08623 - ABC(MRW)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

Crowley Liner Services, Inc.
Crowley Maritime Corporation
Crowley Technical Management
American Roll-On Roll-Off Carrier, LLC

A lawsuit has been filed against you.


Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Preston Easley
Law Offices of Preston Easley
2500 Via Cabrillo Marina, Ste. 106
San Pedro, CA 90731

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: NOV 21 2013

CLERK OF COURT

ANDRES PEDRO
Signature of Clerk or Deputy Clerk

1202

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**I. (a) PLAINTIFFS** (Check box if you are representing yourself ☐)

AMAH ESSJET

DEFENDANTS (Check box if you are representing yourself ☐)

CROWLEY LINER SERVICES INC.; CROWLEY MARITIME CORPORATION; CROWLEY TECHNICAL MANAGEMENT; and AMERICAN ROLL-ON ROLL-OFF CARRIER, LLC.

(b) County of Residence of First Listed Plaintiff Los Angeles

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____

(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

Preston Easley, Esq.
2500 Via Cabrillo Marina, Ste. 106
San Pedro, CA 90731

Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☐ 1. U.S. Government Plaintiff ☒ 3. Federal Question (U.S. Government Not a Party)
- ☐ 2. U.S. Government Defendant ☐ 4. Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1. Original Proceeding ☐ 2. Removed from State Court ☐ 3. Remanded from Appellate Court ☐ 4. Reinstated or Reopened ☐ 5. Transferred from Another District (Specify) ☐ 6. Multi-District Litigation

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)**CLASS ACTION under F.R.Cv.P. 23:** ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ according to proof**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Jones Act 46 U.S.C. Sec. 30104; personal injury to merchant seaman

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	Habeas Corpus:	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	PERSONAL INJURY	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 530 General	SOCIAL SECURITY
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 310 Airplane	PERSONAL PROPERTY	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	Other	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input checked="" type="checkbox"/> 340 Marine	BANKRUPTCY	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	FEDERAL TAX SUITS
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	FORFEITURE/PENALTY	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 690 Other	
<input type="checkbox"/> 895 Freedom of Info. Act	REAL PROPERTY	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 441 Voting	LABOR	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 740 Railway Labor Act	
			<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 751 Family and Medical Leave Act	
			<input type="checkbox"/> 448 Education	<input type="checkbox"/> 790 Other Labor Litigation	
				<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

FOR OFFICE USE ONLY:

Case Number

CV13-08623

CIVIL COVER SHEET

CV-71 (11/13)

Page 1 of 3

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	STATE CASE WAS PENDING IN THE COUNTY OF		INITIAL DIVISION IN CACD IS
	<input type="checkbox"/> Los Angeles		Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo		Western
	<input type="checkbox"/> Orange		Southern
	<input type="checkbox"/> Riverside or San Bernardino		Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	If the United States, or one of its agencies or employees, is a party, is it a:		INITIAL DIVISION IN CACD IS
	PLAINTIFF?	DEFENDANT?	
	<small>Plaintiff is the United States, or one of its agencies or employees, or a party to the lawsuit.</small>	<small>Defendant is the United States, or one of its agencies or employees, or a party to the lawsuit.</small>	
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western	

Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)	A Los Angeles County	B Ventura, Santa Barbara, or San Luis Obispo Counties	C Orange County	D Riverside or San Bernardino Counties	E Outside the Central District of California	F Other
Indicate the location in which a majority of plaintiffs reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

C.1. Is either of the following true? If so, check the one that applies:

- ☐ 2 or more answers in Column C
- ☐ only 1 answer in Column C and no answers in Column D

Your case will initially be assigned to the
SOUTHERN DIVISION.
Enter "Southern" in response to Question D, below.

If none applies, answer question C2 to the right. →

C.2. Is either of the following true? If so, check the one that applies:

- ☐ 2 or more answers in Column D
- ☐ only 1 answer in Column D and no answers in Column C

Your case will initially be assigned to the
EASTERN DIVISION.
Enter "Eastern" in response to Question D, below.

If none applies, go to the box below. ↓

Your case will initially be assigned to the
WESTERN DIVISION.
Enter "Western" in response to Question D below.

Question D: Initial Division?	INITIAL DIVISION IN CACD IS
Enter the initial division determined by Question A, B, or C above: →	Central

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEETIX(a). **IDENTICAL CASES:** Has this action been previously filed in **this court** and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): _____

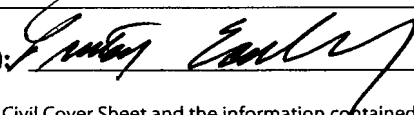
IX(b). **RELATED CASES:** Have any cases been previously filed in **this court** that are related to the present case? ☒ NO ☐ YES

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply)

- ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

X. **SIGNATURE OF ATTORNEY
(OR SELF-REPRESENTED LITIGANT):**

DATE: November 21, 2013

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))